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ID 031 600 FK6*

**Republic**

Engineered Steels

EPA Region 5 Records Ctr.



307733

September 4, 1990

State of Illinois
Environmental Protection Agency
Division of Air Pollution Control
2200 Churchill Road
Springfield, IL 62706

Attention Mr. Anton Telford
Air Pollution Control Engineer

SUBJECT: REPUBLIC ENGINEERED STEELS, INC.
CHICAGO PLANT
AIR PERMIT INFORMATION

RECEIVED**SEP 06 1990****EPA-DAPC-SPFLD.**

Dear Mr. Telford:

Based upon an air compliance inspection by Mr. Cezary Krzymowski conducted at our facility on July 31, 1990 and a subsequent telephone conversation with yourself on August 15, 1990; Republic Engineered Steels, Inc. (Republic) submits the following information to clarify and resolve pending air permit issues for our Chicago Plant.

A. ACTIVE AIR SOURCE PERMITS

Attachment "A" presents a listing of the active air source permits for Republic's Chicago Facility. Operating schedules and tonnage information has been revised pursuant to a series of telephone conversations with Mr. Mark Martin in your staff. Please note in reviewing Republic's files for these sources, we were unable to locate the actual Permit Grant Letters for two of the permits. They are numbers 73031678 (11" Mill - Billet Conditioning Facility - #2 Grinder) and 73031528 (Continuous Coil Annealing Furnaces). I would appreciate if you would send me copies of these two permits.

Republic has reviewed the permit conditions for these permits and will submit an Annual Emissions Report by November 28, 1990 which is the anniversary date for the sale of the Chicago Facilities from LTV Steel Company to Republic.

B. INACTIVE AIR PERMIT SOURCES

In reviewing the series of permits that were transferred from LTV Steel Company to Republic, we determined that a series of the permits were inactive and should subsequently be withdrawn. On July 24, 1990, I transmitted correspondence to Mr. Terry A. Sweitzer, Manager, Permit Section, requesting withdrawal. For your convenience, a copy of the withdrawal acknowledgments correspondence is enclosed (Attachment "B").

C. JOINT AIR PERMITS WITH LTV STEEL COMPANY

A further review of the air permits reveal that three permits are for facilities individually owned, yet jointly represented on permits. They are listed on Attachment "C".

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belong to LTV informed Permittee
of this fact*

For Permit #75120004 (Storage Tanks Greater than 40,000 Gallons), Republic assumes responsibility for four of the seven tanks listed on the permit. They are the 14" Mill East Tank (560,000 Gallons), the 14" Mill West Tank (440,000 Gallons), the 10" Mill Tank (100,000 Gallons), and the 11" Mill Tank (100,000 Gallons). Of these four tanks only two of them are currently in use and require to be permitted. They are for the 10" and 11" Mill Tanks. I request that the Agency revise the Permit to reflect the usage of these two tanks for the storage of #2 Fuel Oil as a backup fuel for the 11" Mill Reheat Furnace. These tanks should be renamed "11" Mill - Backup Fuel Oil Storage Tanks".

For Permit #75120063 (Oil Storage Tanks Less Than 40,000 Gallons), I am referencing the storage tank specifications as attached to the Operating Permit with an expiration date of January 25, 1986 Attachment "D". This is the last date I was able to locate a listing of the permitted tanks. On the attachment I have indicated which storage tanks belong to Republic and which ones belong to LTV Steel Company. For the Republic tanks, I have also indicated which tanks are no longer in service and which tanks we will continue to operate. Please change the permit to reflect this information.

For Permit #88100033 (Gasoline Dispensing Facility), I am requesting the previous application. I was unable to locate in our files which gasoline dispensing facility is being permitted.

Republic presently operates a gasoline dispensing facility in the vicinity of the Bar Coil Annealing Furnaces, and I am unable to determine whether this source is properly permitted.

Finally, Republic also operates a diesel Fuel Oil Dispensing Facility for some of our mobile equipment. This facility which includes a 1,000 gallon storage tank is also located in the vicinity of the Continuous Coil Annealing Furnace Building. I was unable to locate a permit or permit application for this source. Please review your records to see if one exists or is necessary.

D. FUGITIVE DUST OPERATING PROGRAM

Republic recently received a copy of a Fugitive Dust Operating Program Application from Mr. Krzymowski. We will prepare the Application and submit it to the Agency upon completion.

E. 11" MILL BILLET CONDITIONING FACILITY - MODIFICATIONS TO GRINDER
COLLECTION SYSTEMS

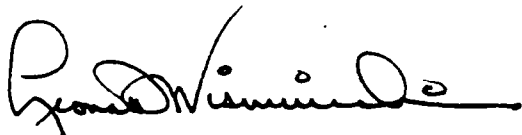
Based upon our telephone conversation, we have determined that a Construction Permit for modifications to the Grinder Collection Systems and Baghouses is not necessary. This is based upon the fact that we are not increasing the through-put rate for the sources (#1 and #2 Grinders), nor are we increasing the emission rate or adding a new pollutant to the system. Rather, we are updating, modifying and improving the existing collection system and control system (baghouses) for these two sources. The two grinders will be exhausted through a new single ductwork system. The duct will be connected to the three (3) existing baghouses in parallel. The baghouses are being refurbished. Two baghouses will be used normally, and one will be available as a backup unit when maintenance is necessary.

I am requesting that the Operating Permits for these two sources (73031679 and 73031678) be modified to reflect the revised conditions. Upon completion of the project, a compliance demonstration will be conducted on the control system.

F. REVISION OF FUEL USAGE

On August 20, 1990, I received correspondence from Mr. Terry A. Sweitzer regarding the modification of fuel usage practices at certain operating facilities from coke-oven gas to natural gas with fuel oil backup (See Attachment "F"). We are compiling this information and will submit it as soon as it is available.

I trust that the above information is sufficient to allow you to make proper administrative changes to Republic's Illinois Air Permits, but should you require any additional information or have any questions concerning this information, please feel free to contact me at (216) 837-6022. Thank you for your cooperation.



Leonard D. Wisniewski
Director, Environmental Affairs

LDW:mme

Enclosures

cc: T.W. Twardzik (Plant Mgr.)
Cezary Krzymowski (IEPA - Chicago District)

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